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*Attorneys for Defendant Google LLC*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and  
on behalf of themselves and all others  
similarly situated

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF CARL SPILLY IN  
SUPPORT OF DEFENDANT GOOGLE  
LLC'S ADMINISTRATIVE MOTION TO  
SEAL THE COURTROOM FOR MARCH  
2, 2023 HEARING**

Referral: Hon. Susan van Keulen, USMJ  
Hearing Date: March 2, 2023  
Hearing Time: 10:00 A.M.

1 I, Carl Spilly, declare as follows:

2 1. I am a member of the bar of the District of Columbia and an attorney for Quinn  
3 Emanuel Urquhart & Sullivan, LLP, which serves as Google's outside counsel in this litigation. I  
4 have been admitted pro hac vice in this matter. (Dkt. 161). I make this declaration of my own  
5 personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify  
6 competently thereto.

7 2. I submit this declaration in support of Google's Administrative Motion to Seal the  
8 Courtroom for March 2, 2023 Hearing.

9 3. On February 26, 2023, counsel for Google requested Plaintiffs identify whether they  
10 intended to discuss at the March 2, 2023 hearing information or material that Google has designated  
11 as Confidential or Highly Confidential-Attorneys' Eyes Only, and whether Plaintiffs opposed or did  
12 not take a position on Google's request to seal the courtroom for the March 2, 2023 hearing.  
13 Plaintiffs responded on February 27, 2023 that they oppose sealing and that codenames could be  
14 used for any sensitive material requiring sealing. The parties conferred on this issue on February 28,  
15 2023, and could not reach agreement.

16  
17 I declare under penalty of perjury of the laws of the United States that the foregoing is true  
18 and correct. Executed in Washington, D.C. on February 28, 2023.

19  
20 DATED: February 28, 2023

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

21 By /s/ Carl Spilly  
22 Carl Spilly

23 *Attorney for Defendant*  
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